

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,  
Plaintiffs,

v.

RICK SNYDER, et al.,  
Defendants.

Case No. 5:16-cv-10444-JEL-MKM  
Hon. Judith E. Levy

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**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF  
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH  
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA  
OPERATING SERVICES, LLC'S OMNIBUS REPLY IN SUPPORT OF  
THEIR MOTIONS TO EXCLUDE CERTAIN OPINIONS AND RELATED  
TESTIMONY OF CLASS PLAINTIFFS' EXPERTS**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit B is a true and correct copy of Dr. David Crowe's March 14, 2023 Response to Dr. Russell's Rebuttal Report.

3. Attached as Exhibit C is a true and correct excerpt of the deposition of Dr. David Crowe.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on July 19, 2023

Boston, Massachusetts

/s/ James M. Campbell  
James M. Campbell